

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA

§

§

v.

§

Case No. 4:22-CR-110

Judge Jordan

MICHAEL HILL, et al.

§

§

**AGREED MOTION FOR PROTECTIVE ORDER**

The discovery material in this case contains private personal identification information of individuals as well as law enforcement sensitive information. As a result, the parties request that the Court issue a protective order governing the use and disclosure of the discovery material and that the order contain the following conditions:

- a. Defense counsel shall maintain the discovery material in accordance with the terms of this protective order and shall use the discovery material solely and exclusively in connection with this case (including trial preparation, trial, and, if necessary, appeals or other related legal proceedings) and for no other purpose;
- b. Only the following individuals may access and view the discovery material:
  - (i) defense counsel; (ii) the defendant, for the sole purpose of assisting in the preparation of their defense and only in the presence and under the direct supervision of defense counsel; and (iii) such members of defense counsel's staff, defense expert witnesses, and consultants as are necessary for the purpose of preparing the defendant's defenses, and only while these staff members, expert witnesses, or consultants are operating under the direct supervision and control of defense counsel;
- c. Defense counsel may print, copy, and/or duplicate the discovery material

only if the printed items, copies, and/or duplicates, are kept under the same control as the original discovery material;

d. Defense counsel will keep a copy of this protective order with the discovery material at all times; and

e. If and when the defendant has exhausted trial and appellate rights, including any claim under 28 U.S. Code § 2255, or upon termination of defense counsel's representation of the defendant, defense counsel shall destroy the discovery material and any printed items, copies or duplication of the discovery material.

Respectfully submitted,

BRIT FEATHERSTON  
UNITED STATES ATTORNEY

/s/ Anand Varadarajan  
ANAND VARADARAJAN  
Assistant United States Attorney  
Texas State Bar No. 24088576  
Email: anand.varadarajan@usdoj.gov

G.R. JACKSON  
Assistant United States Attorney  
Texas State Bar No. 00784874  
Email: glenn.roque-jackson@usdoj.gov

101 East Park Boulevard, Suite 500  
Plano, Texas 75074  
972-509-1201  
Fax: 972-509-1209

**CERTIFICATE OF CONFERENCE**

This is to certify that the Assistant United States Attorney for the Government, Anand Varadarajan, has reached out to all counsel of record regarding this motion. The following counsel do not oppose the motion:

Rafael De La Garza  
Charles Lindley Woods  
David W. Klaudt  
Patricia Garza Burrus  
Mark D. Grosso  
Kambria Rashida Jones Morgan  
Roger Haynes  
Heath Hyde  
James Whalen  
James Lee Bright  
Phillip A. Linder  
Glenn A. Brenner  
Daniel K. Hagood  
Eric A. Durojaiye  
John Hunter Smith

The Government has not heard a final response from Ken Smith, counsel for Fabian Hernandez, and is listing him as opposed:

*/s/ Anand Varadarajan*  
Anand Varadarajan

**CERTIFICATE OF SERVICE**

I certify a true and correct copy of this motion was served on defense counsel by electronic filing (CM/ECF) on this 3<sup>rd</sup> day of June 2022.

*/s/ Anand Varadarajan*  
Anand Varadarajan